

April 21, 2015

Nancy Rodríguez, P.E.
Chief, Multimedia Permits and Compliance Branch
Caribbean Environmental Protection Division
U.S. Environmental Protection Agency, Region 2
City View Plaza II, Suite 7000
48 RD. 165 Km. 1.2
Guaynabo, Puerto Rico 00968-8069

RE: Administrative Order on Consent Docket Number CWA-02-2015-3102 –
Compliance with AOC response to EPA' review of submittals letter received 04/02/2015

Dear Rodríguez:

On March 18, 2015 AES Puerto Rico LP ("AES-PR") and the United States Environmental Protection Agency ("EPA") entered into the above referenced Administrative Order on Consent ("AOC"), under which AES-PR is obligated to comply with certain requirements (AOC Section VII, Ordered Provisions). All capitalized terms in this letter shall have the meaning as defined in the AOC.

This communication is in response to your April 2, 2015 letter providing comments to specific AES-PR submittals related to specific paragraphs of the AOC referenced above. AES-PR hereby addresses the following outstanding items from your communication:

- Paragraph 68 (Benchmark Monitoring and Laboratory Analyses): AES- PR will conduct the benchmark monitoring and submit the corresponding MDMRs according to the AOC submittal deadlines.
- Paragraph 69 (Preparation and Submittal of MDMRs): AES- PR will prepare and submit the corresponding MDMRs according to the AOC submittal deadlines.
- Paragraph 71 (Preparation and Submittal of Comprehensive Site Inspection Reports): As required by Sections 4.3.1 and 4.3.2 of the 2008 Multi Sector General Permit (MSGP), AES's December 19, 2013 Comprehensive Site Inspection (CSI) covered "all areas of the facility affected by the requirements in this permit..." and documented the findings from the examination of such areas using the Form provided in Appendix I of the MSGP. The 2013 CSI took into account all the BMPs included in the Matrix approved by EPA and others that were not included in it. This is so because the matrix was developed exclusively to identify new proposed plant BMPs and did not include the existing ones. Furthermore, the Matrix did not include the BMPs of the marine cargo dock facility.

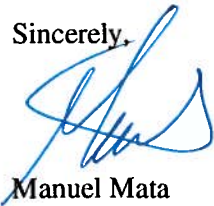
The sub-basins delineated in the Engineering Analysis Report were developed strictly based on hydrological considerations. The geographical boundaries of these sub-basins overlap several operational areas, therefore they are difficult to follow in the field during an inspection and as explained above, do not include "all areas of the facility affected by the requirements in this permit..." therefore using them would be onerous and result in an incomplete CSI.

Furthermore, when AES-PR conducts its site inspections as required by our permits, we review all of the BMPs that are in place, including but not limited to, the delineated sub-basins to ensure that all areas in the facility are performing as expected.

On March 25, 2015 AES-PR submitted to EPA a complete and detailed review of all the BMPs implemented at the site as well as before and after pictures depicting the condition of the areas. This was required under the AOC ¶70, to which EPA accepted the report and closed the item. As required by Section 7.2 of the MSGP, our reports are prepared and submitted using the Form provided as Appendix I of the MSGP and therefore no further action should be required regarding this matter.

AES-PR has taken great strides in making this facility fully compliant with the requirements of our permit with the implementation of a significant number of BMPs. This is a direct confirmation of our role of being good custodians of the environment and adhering to our commitments. Should you have any further concerns or comments regarding please contact us so we can promptly address them.

Sincerely,



Manuel Mata
President AES Puerto Rico

Attachments

**Administrative Order on Consent
AES Puerto Rico Coal Fired Power Plant
Docket Number CWA-02-2015-3102
NPDES Tracking Number PRU020663**

Certification

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."



Manuel Mata President AES Puerto Rico

4/22/15

Date